

UNITED STATES DISTRICT COURT
FOR THE
DISTRICT OF VERMONT

2020 JUL -7 AM 10: 54

CLERK

BY F. H. S.
DEPUTY CLERK

UNITED STATES OF AMERICA,
Plaintiff,

v.

BRADLEY SALDI,
Defendant.

Docket No. 2:23-mj-77

MOTION FOR DETENTION

NOW COMES the United States of America, by and through its attorney, Nikolas P. Kerest, United States Attorney for the District of Vermont moves for pretrial detention of the above-named defendant pursuant to 18 U.S.C. § 3142(e) and (f).

1. Eligibility for Detention. This defendant is eligible for detention because the case involves an offense under the Controlled Substances Act for which a maximum term of imprisonment of ten years or more is prescribed. *See* 18 U.S.C. § 3142(f)(1)(C).

2. Reason For Detention. The Court should detain the defendant because there are no conditions of release which will reasonably assure the safety of any other person and the community and the defendant's appearance as required.

3. Rebuttable Presumption. The United States will not invoke the rebuttable presumption against defendant under § 3142(e).

4. Time For Detention Hearing. The United States requests the court conduct the detention hearing upon completion of the pretrial services report.

5. Other Matters. Defendant Saldi is believed to be an active abuser of controlled substances, including opiates, at the time of his arrest. Defendant Saldi's criminal history (which, based on the NCIC database, appears to span 1 felony and 22 misdemeanor convictions)

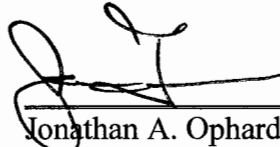
includes convictions indicating a likelihood not to follow court conditions, include convictions for violation of an abuse prevention order, violation of conditions of release, and assault on law enforcement/resisting arrest. Based on the nature of the offense and defendant Saldi's personal history and characteristics, the government submits that there are no conditions of release which will reasonably assure the safety of the community.

Dated at Burlington, in the District of Vermont, July 7, 2023.

Respectfully submitted,

NIKOLAS P. KEREST
United States Attorney

By:



Jonathan A. Ophardt
Jason M. Turner
Assistant U.S. Attorneys
P.O. Box 570
Burlington, VT 05402-0570
(802) 951-6725